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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

v.

JOSEPH RICHARD CARUSO,

Defendant.

3:17-cr-00425-BR

**UNOPPOSED MOTION FOR ENTRY
OF A STIPULATED ORDER FOR AN
INTERLOCUTORY SALE OF
BITCOIN, BITCOIN CASH,
ETHEREUM AND LITECOIN
SEIZED FROM DEFENDANT
JOSEPH RICHARD CARUSO**

The United States of America, by and through its counsel, Billy J. Williams, United States Attorney for the District of Oregon, and Scott M. Kerin, Assistant United States Attorney, respectfully moves this court for Entry of a Stipulated Order for an interlocutory sale of Bitcoin, Bitcoin cash, Ethereum and Litecoin, seized from defendant Joseph Richard Caruso.

Pursuant to Local Rule 7-1(a)(1), the government has contacted and conferred with counsel for the defendant, Conor Huseby, regarding the Interlocutory Sale of the virtual currency seized from Defendant and there is no objection to this Motion.

The parties request that the virtual currency seized from Defendant be sold by Homeland Security Investigations (HSI), and the proceeds of the sale be distributed in the following order:

1. Homeland Security Investigations (HSI) and/or United States Customs and Border Protection shall be compensated for all costs, including processing, selling and/or exchanging this virtual currency.
2. The remainder shall be ultimately deposited in the United States Treasury Seized Deposit Fund and substituted in all respects for the virtual currency in this criminal action, as the substitute *res*.

WHEREFORE, the United States moves this Court for Entry of a Stipulated Order for an interlocutory sale of Bitcoin, Bitcoin cash, Ethereum and Litecoin, seized from defendant Joseph Richard Caruso.

DATED this 5th day of December 2017.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Scott M. Kerin
SCOTT M. KERIN
Assistant United States Attorney